

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M.
Williams,
Magistrate Judge

**THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER
PRECLUDING DEPOSITIONS OF CERTAIN EMPLOYEES**

Zhejiang Huahai Pharmaceutical Co., Ltd, Huahai US, Inc., Princeton
Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively the “ZHP
Parties”), pursuant to this Court’s January 11, 2021 Order (Dkt. No. 727), file this
Motion for Protective Order and aver as follows:

1. In support of the instant motion, the ZHP Parties will rely on their
accompanying brief, exhibits, and proposed order.

January 20, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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